

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

JEFFREY LAYDON, on behalf of himself and all
others similarly situated,

Plaintiff,

- against -

MIZUHO BANK, LTD., THE BANK OF TOKYO-
MITSUBISHI UFJ, LTD., SUMITOMO MITSUI
BANKING CORPORATION, RESONA BANK, LTD.,
MIZUHO CORPORATE BANK, LTD., THE BANK
OF YOKOHAMA, LTD., MITSUBISHI UFJ TRUST
AND BANKING CORPORATION, MIZUHO TRUST
AND BANKING CO., LTD., THE SUMITOMO
TRUST AND BANKING CO., LTD., CITIBANK,
JAPAN LTD., JPMORGAN CHASE BANK, NA, THE
ROYAL BANK OF SCOTLAND GROUP PLC,
DEUTSCHE BANK AG., UBS AG, BNP PARIBAS
S.A., SHINKIN CENTRAL BANK, THE SHOKO
CHUKIN BANK, THE NORINCHUKIN BANK,
BARCLAYS BANK PLC, HSBC HOLDINGS PLC,
CITIBANK NA, CRÉDIT AGRICOLE CIB, LLOYDS
BANKING GROUP PLC, SOCIÉTÉ GÉNÉRALE,
AND RABOBANK GROUP,

Defendants.

Docket No. 1:12-cv-03419-GBD

**STIPULATION AND [REDACTED] ORDER ADJOURNING DEFENDANT THE
SUMITOMO TRUST AND BANKING CO., LTD.'s TIME TO ANSWER, MOVE TO
DISMISS, OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Plaintiff Jeffrey Laydon ("Plaintiff") and defendant The Sumitomo Trust and
Banking Co., Ltd. ("Sumitomo Trust") by and through their respective undersigned counsel,
subject to this Court's approval, and to the reservation of rights contained in paragraph 4 below,
agree and stipulate as follows:

RECTALS

WHEREAS, on April 30, 2012, Plaintiff Jeffrey Laydon commenced this action in this District by the filing of a summons and complaint (the "complaint") against the defendants herein;

WHEREAS, Plaintiff has commenced service of the complaint upon the defendants;

WHEREAS, Sumitomo Trust has agreed to waive service of the complaint consistent with Rule 4(d) of the Federal Rules of Civil Procedure ("Fed. R. Civ. P."), and service of the complaint continues against other defendants;

WHEREAS, the various defendants' responses to the complaint would be due at various dates depending upon the dates of service;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:

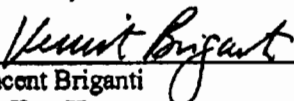
1. Sumitomo Trust agrees to waive service of the complaint consistent with Fed. R. Civ. P. 4(d).
2. Sumitomo Trust's time to answer, move to dismiss or otherwise respond to the complaint is hereby adjourned *sine die* and shall be determined by a later stipulation between the parties or Order of the Court.
3. This Stipulation shall not act to shorten the time for response of Sumitomo Trust that would otherwise have a longer time to respond to the complaint pursuant to the Federal Rules of Civil Procedure or any applicable local rules, and shall be without prejudice to Sumitomo Trust's right to seek, and Plaintiff's right to oppose, an additional extension of time to respond to the complaint in this action.

4. Except as to the defense of insufficiency of service of process in this action, no defense of Sumitomo Trust, including without limitation defenses based upon lack of personal jurisdiction, is prejudiced or waived by Sumitomo Trust's executing, agreeing to, or filing this Stipulation.

5. This Stipulation may be executed in separate counterparts, and counterparts may be executed in facsimile form, each of which shall be an original.

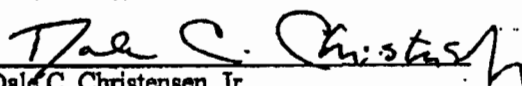
Dated: June 21, 2012

**LOWEY DANNENBERG COHEN
& HART, P.C.**



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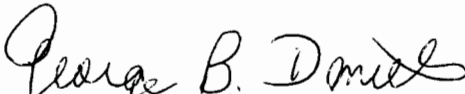
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*Attorneys for Defendant The Sumitomo Trust
and Banking Co., Ltd.*

SO ORDERED.

DATED:

JUL 16 2012

New York, New York



HON. GEORGE B. DANIELS
United States District Judge